

AB:MJB

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF NEW YORK

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UNITED STATES OF AMERICA

- against -

VAMORRIS DOSSO

a/k/a MORRIS BARRY,

Defendant.

AFFIDAVIT IN SUPPORT OF  
REMOVAL TO THE  
DISTRICT OF NORTH DAKOTA

(Fed. R. Crim. P. 5)

No. 20-MJ-186

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EASTERN DISTRICT OF NEW YORK, SS:

JOSEPH MARCUS, being duly sworn, deposes and states that he is a Special Agent with the United States Postal Inspector (“USPIS”), duly appointed according to law and acting as such.

On or about November 20, 2014, the United States District Court for the District of North Dakota issued an arrest warrant commanding the arrest of the defendant VAMORRIS DOSSO, a/k/a MORRIS BARRY, in connection with a superseding indictment, under docket number 3:14-CR-69-01 (RRE), charging the defendant with conspiracy to commit bank fraud and bank fraud, in violation of Title 18, United States Code, Sections 1344 and 1349.

The source of your deponent's information and the grounds for his belief are as follows:<sup>1</sup>

1. On or about November 20, 2014, the United States District Court for the District of North Dakota issued an arrest warrant commanding the arrest of the defendant VAMORRIS DOSSO in connection with a superseding indictment charging the defendant with conspiracy to commit bank fraud and bank fraud, in violation of Title 18, United States Code, Sections 1344 and 1349. True and correct copies of the arrest warrant and the superseding indictment are attached as Exhibit A and Exhibit B, respectively.

2. On February 22, 2020, the defendant VAMORRIS DOSSO was present at John F. Kennedy International Airport in Queens, New York, scheduled to board Ethiopian Airlines flight ET 513 scheduled to depart at 22:15 to Abidjan, located in the Ivory Coast. The defendant's airline ticket was in the name VAMORRIS DOSSO. While at the airport, the defendant was stopped for questioning by a USPIS Special Agent who identified the defendant based on the name on the airline ticket, photographs provided from the District of North Dakota as well as the name and photograph on the temporary travel document the defendant presented to the officer, which matched the name and date of birth of the individual who was wanted in the District of North Dakota. Specifically, the defendant presented a temporary travel document to the officer with the name "VAMORRIS DOSSO" and the defendant's date of birth, October 10, 1986.

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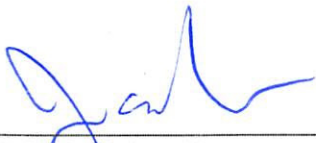
<sup>1</sup> Because the purpose of this affidavit is to set forth only those facts necessary to establish probable cause for removal, I have not described all the relevant facts and circumstances of which I am aware.

3. While at the airport, a USPIS Special Agent called out to the defendant using the defendant's last name, "DOSSO," and the defendant responded. The defendant also acknowledged that he was VAMORRIS DOSSO. Additionally, the defendant's mother, Nassere Fadiga Epse Dosso, was called, via speakerphone, by a USPIS Special Agent and the defendant acknowledged that the woman on the telephone call was his mother.

4. Further, I have reviewed photographs of the VAMORRIS DOSSO wanted in the District of North Dakota. Based on those photographs and my observations of the defendant during his arrest and booking, I believe that the defendant is the VAMORRIS DOSSO wanted in the District of North Dakota.

5. Additionally, on March 13, 2013, Immigration Judge Robert Vinikoor issued a final order of removal to the Ivory Coast for the defendant, VAMORRIS DOSSO.

WHEREFORE, your deponent respectfully requests that the defendant  
VAMORRIS DOSSO be removed to the District of North Dakota so that he may be dealt  
with according to law.

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MARCUS JOSEPH *Marcus*  
Special Agent  
U.S. Postal Inspector

Sworn to before me this  
24th day of February, 2020

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THE HONORABLE ROBERT M. LEVY  
UNITED STATES MAGISTRATE JUDGE  
EASTERN DISTRICT OF NEW YORK

# EXHIBIT A

**UNITED STATES DISTRICT COURT**  
**DISTRICT OF NORTH DAKOTA**  
**SOUTHEASTERN DIVISION**

United States of America  
v.  
Vamorris Dosso a/k/a Morris Barry

Case No. 3:14-cr-69-01

\_\_\_\_\_  
*Defendant*

**ARREST WARRANT**

To: Any authorized law enforcement officer

**YOU ARE COMMANDED** to arrest and bring before a United States magistrate judge without unnecessary delay

(name of person to be arrested)

Vamorris Dosso a/k/a Morris Barry

who is accused of an offense or violation based on the following document filed with the court:

- ☐ Indictment     ☒ Superseding Indictment     ☐ Information     ☐ Superseding Information     ☐ Complaint  
☐ Probation Violation Petition     ☐ Supervised Release Violation Petition     ☐ Violation Notice     ☐ Order of the Court

This offense is briefly described as follows:

Conspiracy to Commit Bank Fraud  
Forfeiture Allegation



Date: 11/20/2014

/s/ Ashley Sanders

Issuing officer's signature

City and state: Fargo, ND

Ashley Sanders, Deputy Clerk

Printed name and title

**Return**

This warrant was received on (date) \_\_\_\_\_, and the person was arrested on (date) \_\_\_\_\_  
at (city and state) \_\_\_\_\_.

Date: \_\_\_\_\_

Arresting officer's signature

Printed name and title

**This second page contains personal identifiers provided for law-enforcement use only  
and therefore should not be filed in court with the executed warrant unless under seal.**

*(Not for Public Disclosure)*

Name of defendant/offender: \_\_\_\_\_

Known aliases: \_\_\_\_\_

Last known residence: \_\_\_\_\_

Prior addresses to which defendant/offender may still have ties: \_\_\_\_\_

Last known employment: \_\_\_\_\_

Last known telephone numbers: \_\_\_\_\_

Place of birth: \_\_\_\_\_

Date of birth: \_\_\_\_\_

Social Security number: \_\_\_\_\_

Height: \_\_\_\_\_ Weight: \_\_\_\_\_

Sex: \_\_\_\_\_ Race: \_\_\_\_\_

Hair: \_\_\_\_\_ Eyes: \_\_\_\_\_

Scars, tattoos, other distinguishing marks: \_\_\_\_\_

History of violence, weapons, drug use: \_\_\_\_\_

Known family, friends, and other associates (*name, relation, address, phone number*): \_\_\_\_\_

FBI number: \_\_\_\_\_

Complete description of auto: \_\_\_\_\_

Investigative agency and address: \_\_\_\_\_

Name and telephone numbers (office and cell) of pretrial services or probation officer (*if applicable*): \_\_\_\_\_

Date of last contact with pretrial services or probation officer (*if applicable*): \_\_\_\_\_

## EXHIBIT B



IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NORTH DAKOTA  
SOUTHEASTERN DIVISION

UNITED STATES OF AMERICA

v.

VAMORRIS DOSSO,  
a/k/a MORRIS BARRY;  
and CHUDE UMEH,  
a/k/a FALLY DIAPUTA,  
a/k/a GREGORY SUH,  
a/k/a RICHARD AMOAH

SUPERSEDING  
INDICTMENT

Case No. 3:14-CR-00069

Violation: 18 U.S.C. §§ 981(a)(1)(C),  
982(a)(2)(A), and 1349; 21 U.S.C.  
§ 853(p); and 28 U.S.C. § 2461(c)

**Conspiracy to Commit Bank Fraud**

Introduction

At all times relevant to this Indictment:

1. VAMORRIS DOSSO, a/k/a MORRIS BARRY; and CHUDE UMEH, a/k/a FALLY DIAPUTA, a/k/a GREGORY SUH, a/k/a RICHARD AMOAH, resided in the Fargo, North Dakota, area;

2. A “means of identification” is any name or number that may be used, alone or in conjunction with any other information, to identify a specific individual, including but not limited to, a name, Social Security number, or date of birth;

3. Bell State Bank and Trust was a financial institution within the meaning of 18 U.S.C. § 20, the deposits of which were insured by the Federal Deposit Insurance Corporation (FDIC);

4. First International Bank and Trust was a financial institution within the meaning of 18 U.S.C. § 20, the deposits of which were insured by the FDIC;

5. Alerus Financial was a financial institution within the meaning of 18 U.S.C. § 20, the deposits of which were insured by the FDIC;

6. Vision Bank was a financial institution within the meaning of 18 U.S.C. § 20, the deposits of which were insured by the FDIC;

7. Cornerstone Bank was a financial institution within the meaning of 18 U.S.C. § 20, the deposits of which were insured by the FDIC; and

8. Bank of the West was a financial institution within the meaning of 18 U.S.C. § 20, the deposits of which were insured by the FDIC.

Background of the Conspiracy

1. At all times relevant to this Indictment, VAMORRIS DOSSO, a/k/a MORRIS BARRY; and CHUDE UMEH, a/k/a FALLY DIAPUTA, a/k/a GREGORY SUH, a/k/a RICHARD AMOAH, resided in the Fargo, North Dakota, area and participated in a criminal organization that engaged in various financial crimes in the District of North Dakota, and elsewhere. Specifically, the participants in the organization fraudulently used the identities of other individuals to open bank accounts and then deposit counterfeit or otherwise invalid financial instruments into the accounts;

2. The participants of the conspiracy and scheme then conducted a so-called “bust out” scheme, in which they opened bank accounts using other people’s identities, cashed and deposited counterfeit and otherwise fraudulent financial instruments into the accounts, and then withdrew the funds within a short period of time so that the financial institutions could not discover and prevent the fraud;

3. From on or about January 1, 2014, through the date of this Superseding Indictment, in the District of North Dakota, and elsewhere, VAMORRIS DOSSO, a/k/a MORRIS BARRY; and CHUDE UMEH, a/k/a FALLY DIAPUTA, a/k/a GREGORY SUH, a/k/a RICHARD AMOAH, and others, both known and unknown to the grand jury, did knowingly, willfully, and unlawfully combine, conspire, confederate, and agree together, to commit financial institution fraud, in violation of 18 U.S.C. § 1344; and

4. It was a part and an object of the conspiracy that VAMORRIS DOSSO, a/k/a MORRIS BARRY; CHUDE UMEH, a/k/a FALLY DIAPUTA, a/k/a GREGORY SUH, a/k/a RICHARD AMOAH, and others, both known and unknown to the grand jury, did knowingly, willfully, and unlawfully execute and attempt to execute a scheme and artifice to defraud financial institutions, the deposits of which were then insured by the FDIC, and to obtain any of the monies, funds, credits, assets, securities, and other property owned by, and under the custody and control of, such financial institutions, by means of false and fraudulent pretenses, representations, and promises, in violation of 18 U.S.C. § 1344.

Overt Acts

In furtherance of this conspiracy, and to affect the illegal object thereof, the following overt acts, among others, were committed by VAMORRIS DOSSO, a/k/a MORRIS BARRY; and CHUDE UMEH, a/k/a FALLY DIAPUTA, a/k/a GREGORY SUH, a/k/a RICHARD AMOAH, and others, both known and unknown to the grand jury, in the District of North Dakota, and elsewhere:

a. On or about July 8, 2013, VAMORRIS DOSSO, a/k/a MORRIS BARRY, falsely represented himself as O.O. and opened an account (account number xxx2491) at Bell State Bank and Trust (Bell), in Fargo, North Dakota, after presenting an altered/counterfeit passport from the Republic of the Ivory Coast;

b. On or about August 8, 2013, VAMORRIS DOSSO, a/k/a MORRIS BARRY, while posing as O.O., deposited a \$2,610.10 counterfeit check into Bell account number xxx2491;

c. On or between July 15, 2013, and August 14, 2013, VAMORRIS DOSSO, a/k/a MORRIS BARRY, personally made and directed others to make several withdrawals from Bell account number xxx2491, even though there were insufficient funds in the account;

d. On or about July 9, 2013, VAMORRIS DOSSO, a/k/a MORRIS BARRY, falsely represented himself as A.B. and opened an account (account number xxx5114) at Bell after presenting an altered/counterfeit passport from the Republic of the Ivory Coast;

e. On or between July 26, 2013, and July 30, 2013, VAMORRIS DOSSO, a/k/a MORRIS BARRY, personally desposited and directed others to deposit three counterfeit checks totaling \$3,000 into Bell account number xxx5114;

f. On or between July 14, 2013, and August 14, 2013, VAMORRIS DOSSO, a/k/a MORRIS BARRY, personally instructed and directed others to

make several withdrawals from Bell account number xxx5114, even though there were insufficient funds in that account;

g. On or about July 3, 2014, VAMORRIS DOSSO, a/k/a MORRIS BARRY, falsely represented himself as M.B. and opened an account (account number xxx1296) at First International Bank and Trust (FIBT) in West Fargo, North Dakota, by presenting an altered/counterfeit passport from the Republic of the Ivory Coast and a counterfeit Illinois driver's license;

h. On or about August 21, 2014, VAMORRIS DOSSO, a/k/a MORRIS BARRY, while posing as M.B., visited four different FIBT branches and cashed four separate checks on Bell account xxx5114, which resulted in a loss to FIBT of \$5,577.97;

i. On or about July 18, 2014, VAMORRIS DOSSO, a/k/a MORRIS BARRY, falsely represented himself as M.B., and opened Alerus account number xxx7098 by presenting a counterfeit Illinois driver's license;

j. On or about August 29, 2014, VAMORRIS DOSSO, a/k/a MORRIS BARRY, while posing as M.B., went to eight separate Alerus branches within four hours and cashed eight fraudulent checks resulting in a loss to Alerus of approximately \$20,000.00; and

k. On or about July 18, 2014, VAMORRIS DOSSO, a/k/a MORRIS BARRY, falsely represented himself as M.B. and opened Bell account number xxx4233 by presenting a counterfeit Illinois driver's license;

All in violation of Title 18, United States Code, Section 1349.

FORFEITURE ALLEGATION

The Grand Jury Further Finds That:

Upon conviction of the conspiracy to commit bank fraud Count One of this  
Superseding Indictment,

VAMORRIS DOSSO, a/k/a MORRIS BARRY; and  
CHUDE UMEH, a/k/a FALLY DIAPUTA, a/k/a GREGORY SUH,  
a/k/a RICHARD AMOAH,

shall forfeit to the United States, pursuant to 18 U.S.C. §§ 981(a)(1)(C) and  
982(a)(2)(A), and 28 U.S.C. § 2461(c), all of his right, title, and interest in any property,  
real or personal, which constitutes or is derived from proceeds traceable to the violations  
of 18 U.S.C. § 1349, including but not limited to the following:

A sum of United States currency representing the amount of proceeds obtained as  
a result of the offenses.

If any of the assets described above as being subject to forfeiture, are unavailable  
for forfeiture as a result of any act or omission of VAMORRIS DOSSO, a/k/a MORRIS  
BARRY; and CHUDE UMEH, a/k/a FALLY DIAPUTA, a/k/a GREGORY SUH,  
a/k/a RICHARD AMOAH:

- a. cannot be located upon the exercise of due diligence;
- b. has been transferred or sold to, or deposited with, a third person;
- c. has been placed beyond the jurisdiction of the Court;
- d. has been substantially diminished in value; or
- e. has been commingled with other property which cannot be subdivided  
without difficulty;


it is the intent of the United States, pursuant to 21 U.S.C. § 853(p), as incorporated by

28 U.S.C. § 2461(c), to seek forfeiture of any other property of said defendant up to the value of said property described above as being subject to forfeiture.

A TRUE BILL:



Foreperson

  
\_\_\_\_\_  
for: TIMOTHY Q. PURDON  
United States Attorney

NWC:tla